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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

YAN CHEN,

Defendant.

CASE NO. 2:23-cr-00069-JAM

**STIPULATION REGARDING CONTINUANCE
OF SENTENCING; FINDINGS AND ORDER**

DATE: June 4, 2024
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on June 4, 2024.
2. The government and defense agree that sentencing should be postponed for the following reasons: to permit the defendant time to meet her obligations in the plea agreement. By this stipulation, the parties now move to re-set the matter for sentencing on **October 22, 2024, at 09:00 a.m.**, and request that the Court set the following schedule:

- a) The Probation Interview has been completed;
- b) The draft PSR will be completed on or before **September 10, 2024**;
- c) Informal objections to the presentence investigation report ("PSR") will be completed on or before **September 24, 2024**;
- d) A final PSR shall be filed by the probation officer on or before **October 1, 2024**;

1 e) Formal objections to, and motions for correction of, the PSR shall be filed on or
2 before **October 8, 2024**;

3 f) Replies to objections to, and motions for correction of, the PSR shall be filed on
4 or before **October 15, 2024**;

5 g) Sentencing memoranda shall be filed on or before **October 15, 2024**.
6 IT IS SO STIPULATED.

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8 Dated: May 14, 2024

PHILLIP A. TALBERT
United States Attorney

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10 /s/ ROGER YANG
ROGER YANG
Assistant United States Attorney

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13 Dated: May 14, 2024

/s/ SHAWN SALEHIEH
SHAWN SALEHIEH
Counsel for Defendant
Yan Chen

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15
16 **ORDER**

17 IT IS SO FOUND AND ORDERED.

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19 Dated: May 15, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE